

EXHIBIT A



BRIAN J. MASTERNAK

616.752.2205
FAX 616.222.2205

bmasternak@wnj.com

December 20, 2012

VIA EMAIL

John S. Martin
Hunton & Williams LLP
2200 Pennsylvania Avenue NW
Washington, DC 20037

Theodore B. Bell
Wolf Haldenstein Adler Freeman & Herz LLC
55 West Monroe Street, Ste. 1111
Chicago, IL 60603

Ryan Danks
Liberty Square Building
450 Fifth Street NW, Ste. 4100
Washington, DC 20530

Re: Spectrum Health Systems

Dear Messrs. Martin, Bell and Danks:

I am writing to request the immediate destruction or return of certain privileged information that was inadvertently produced by Spectrum Health System and/or one of its subsidiary entities (collectively "Spectrum").

As you are aware, Spectrum is not a party to any of the currently pending actions involving allegations over Blue Cross Blue Shield of Michigan's ("BCBSM") alleged use of "Most Favored Nation" discount clauses in certain hospital contracts. Nevertheless, Spectrum has produced a substantial volume of documents in connection with those actions and has consented to the use of such documents in the various proceedings, subject to the terms of the protective order entered in those cases. Spectrum recently learned, however, that it had inadvertently produced certain documents that are protected by the attorney-client privilege. Specifically, we understand BCBSM attached documents labeled SCH-DOJ-012299, SCH-DOJ-012300, SCH-DOJ-012379, SCH-DOJ-012380 and SCH-DOJ-015174 to a recently-filed Response to a Motion to Quash. Those documents clearly reflect communications containing legal advice between Spectrum and its outside counsel, Joseph Aoun. Spectrum produced these documents inadvertently, and did not intend to waive the protections of the attorney-client privilege by producing those documents, nor is Spectrum willing to waive the privilege at this time.

John S. Martin
Theodore B. Bell
Ryan Danks
December 20, 2012
Page 2

Spectrum requests that all parties immediately return all copies of the documents listed above to the undersigned, and also return any and all copies of documents that are substantially similar to the above-listed documents even if they bear different bates numbers. In the alternative, a party may destroy all copies, both hard copy and electronic, of such documents and certify such destruction to the undersigned. Spectrum further requests that no further use be made of those documents or the information contained therein, including but not limited to any use in connection with the Motion to Quash referenced above.

I request that you confirm your agreement with Spectrum's request by close of business on December 21, 2012. Thank you for your anticipated cooperation. If you have questions or concerns, please do not hesitate to contact me.

Very truly yours,



Brian J. Masternak

bjm/alg
8816452-1